UNITED STATES DISTRICT COURT EASTERN DISTRICT OF LOUISIANA

BILL OF INFORMATION FOR THEFT OF GOVERNMENT FUNDS

UNITED STATES OF AMERICA * CRIMINAL DOCKET NO.

v. * SECTION:

SHAWNTELL MANUEL * VIOLATION: 18 U.S.C. § 641

* * *

The United States Attorney charges that:

COUNT 1

A. AT ALL TIMES MATERIAL HEREIN:

- 1. The United States Small Business Administration, (hereinafter "SBA") was an agency and department of the United States of America.
- 2. SBA provided low interest disaster business and home loans for physical damage, and other losses to real property, business content and economic injury caused by a natural disaster.
 - 3. Hurricane Katrina struck southeastern Louisiana on or about August 29, 2005.
- 4. The defendant, **SHAWNTELL MANUEL** (hereinafter "**MANUEL**"), owned and operated the Big Dog Barber Shop and B&D Barber College located at 1320-1322 Odeon

Street, New Orleans, Louisiana 70114 in the Eastern District of Louisiana. **MANUEL** also owned and operated the Big Dog Washateria located at 726 4th Street, Westwego, Louisiana, 70094 in the Eastern District of Louisiana.

- 5. As a result of alleged Hurricane Katrina damage to **MANUEL'S** business properties, starting on or about October 2005, **MANUEL** applied to the SBA for low interest disaster loans on her business properties. The business properties loan was approved for \$123,800.
- 6. On or about April 5, 2006, in the Eastern District of Louisiana, the defendant, MANUEL attended an SBA loan closing with representatives and agents of the SBA where in she executed an SBA disaster business loan for \$123,800 for both her Big Dog Barber Shop and B&D Barber College located at 1320-1322 Odeon Street New Orleans, Louisiana and her Big Dog Washateria, located at 726 Fourth Street, Westwego, Louisiana. After the loan closing, SBA disbursed \$5,000 on or about April 21, 2006 and \$5,000 on or about July 1, 2006 on MANUEL's disaster business loan. Further disbursements required the defendant to submit documents to the SBA for approval. Prior to disbursement of any future disaster loan funds in excess of \$10,000, SBA loan conditions required the borrower to submit a copy of a valid building permit or written evidence from a proper authority that a building permit was not required. Also, SBA required the borrower to submit a written construction contract covering the cost of repairs/construction work as well as paid receipts and/or invoices or canceled checks for work performed satisfactorily to SBA standards.

B. THEFT OF GOVERNMENT FUNDS:

From on or about October 2005 through on or about September 2006, in the Eastern

District of Louisiana, the defendant, **SHAWNTELL MANUEL**, did knowingly steal, purloin and convert to her own use, funds and money belonging to the Small Business Administration, a department and agency of the United States, namely, SBA disaster loan disbursement payments in the amount of \$123,800 to which she knew she was not entitled; all in violation of Title 18, United States Code, Section 641.

JIM LETTEN

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New Orleans, Louisiana January 23, 2009